

**From:** [Suplee, Mike](#)  
**To:** [Greeley, Carrie](#)  
**Subject:** FW: proposed amendments to adopt Circular DEQ-12A  
**Date:** Tuesday, April 01, 2014 1:51:14 PM  
**Attachments:** [FlatheadLakers3-31-14nutrientstdscomments.pdf](#)

---

---

**From:** Robin Steinkraus [mailto:[lakers@flatheadlakers.org](mailto:lakers@flatheadlakers.org)]  
**Sent:** Tuesday, April 01, 2014 1:19 PM  
**To:** Johnson, Elois  
**Cc:** Suplee, Mike; Mathieus, George; Jason Gildea; Laidlaw.tina@Epa.gov  
**Subject:** proposed amendments to adopt Circular DEQ-12A

Elois Johnson,

Attached is the Flathead Lakers' comment letter regarding the proposed amendment to adopt Department Circular DEQ-12A base nutrient standards for total nitrogen and total phosphorus. I am also mailing a hard copy of this letter to you today. Thank you.

Robin

Robin Steinkraus, Executive Director  
Flathead Lakers  
PO Box 70  
Polson, MT 59860  
406-883-1346

P.O. Box 70 · Polson, MT 59860  
(406) 883-1346  
Fax (406) 883-1357  
lakers@flatheadlakers.org  
www.flatheadlakers.org



**Flathead Lakers:**  
*Working for clean water, a healthy  
ecosystem, and lasting quality of life in  
the Flathead Watershed*

March 31, 2014

Robin Shropshire, Chair  
Montana Board of Environmental Review  
c/o Elois Johnson  
Department of Environmental Quality  
P.O. Box 200901  
Helena, Montana 59620-0901

Re: Proposed amendment to adopt Department Circular DEQ-12A base nutrient standards for total nitrogen and total phosphorus

Dear Chairman Shropshire and Montana Board of Environmental Review:

The Flathead Lakers support adoption and implementation of the proposed base numeric nutrient standards for total nitrogen and total phosphorus described in Department Circular DEQ-12A.

The Flathead Lakers is a nonprofit organization working for clean water, healthy ecosystems and lasting quality of life in the Flathead Watershed. Founded in 1958, our organization currently has 1,500 members.

Our organization has long supported the Flathead Basin Water Quality Monitoring Program and we have been engaged in the development of Flathead Lake and watershed TMDLs since the 1990s. Our education, advocacy, and stewardship programs are aimed toward protecting water quality in Flathead Lake and throughout its watershed and improving water quality through reductions in point and nonpoint source pollution.

We appreciate the Nutrient Work Group and Montana Department of Environmental Quality (DEQ) staff's diligence, proficiency, and perseverance in developing the proposed nutrient standards for wadeable streams and rivers, including the technical and scientific analysis that provides the foundation for the standards. The proposed standards will be critical for ensuring that the Flathead Watershed's, as well as all of Montana's, vital streams and rivers remain clean and healthy or are restored to health to support their many beneficial uses critical for healthy ecosystems and economies.

We are disappointed that DEQ did not provide the technical and scientific basis for the proposed Flathead Lake numeric nutrient standards to the public and the Board for review prior to the March 24 Board hearing and that the agency did not recommend that the Board adopt those standards at this time. We continue to support adoption of the 2001 Flathead Lake TMDL Phase I targets for nutrient loading in Flathead Lake as the Flathead Lake nutrient standards. However, a document describing the technical and scientific support for those standards is needed.

The explanation given by DEQ Water Quality Specialist Dr. Michael Suplee at the Board hearing for his request to postpone adopting the nutrient standards proposed for Flathead Lake was related to concerns raised about changes in lake conditions since the 2001 Flathead Lake TMDL Phase I nutrient target levels were set. We wish to point out that although current water quality is a consideration in setting water quality standards, the Clean Water Act requires that standards be based on what is necessary to achieve and maintain designated beneficial uses. It is important that the state provide technical justification for the standards on this basis so that there is no delay in EPA approval.

The Flathead Lakers support the adoption of the proposed numeric nutrient standards for wadeable streams and rivers. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg", with a stylized flourish at the end.

Greg McCormick  
President

A handwritten signature in black ink, appearing to read "Robin", with a stylized flourish at the end.

Robin Steinkraus  
Executive Director

cc: Dr. Michael Suplee, DEQ  
George Mathieus, DEQ  
Jason Gildea, EPA  
Tina Laidlaw, EPA